



SECOND STAGE CONSULTATION – PARTICIPANT RESPONSE PACK

METROLOGY PROCEDURE:

Part A National Electricity Market Version 5.30

Part B: Metering Data Validation, Substitution and
Estimation Procedure for Metering Types 1 – 7 Version
5.30

Participant: AGL

Completion Date: 5th December 2014

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1. Proposed Changes

This section lists the changes proposed by participants or by AEMO since the last completed consultation of the *Metrology Procedure*.

- Section 1A covers the proposed changes for the *Metrology Procedure: Part A Version 5.30*
- Section 1B covers the proposed changes for the *Metrology Procedure: Part B Version 5.30*

NOTE: All proposed additions to the Metrology Procedures are highlighted in red colour text and are underlined. All proposed deletions from the Metrology Procedures are highlighted in red strike through text. Example: ~~Reference~~.

Please include your comments in the 'Participant Comment' column below.

A. Proposed Changes to Metrology Procedure: Part A

Item	Description	Comments
1	PROPOSED/ REQUESTED CHANGES	
1.1	Align version numbering Align version number of Metrology Procedure: Part A with that for Part B to Version 5.30.	Agree
1.2	Clause 2.4.26 Correct clause reference to 2.2.24, i.e. change 2.4.23 to 2.4.24.	Agree
1.3	3.3.3(d) Italicise <i>calculated metering data</i> .	Agree
1.4	Clause 3.9.4 Correct clause reference to 3.9.1, i.e. change 3.10.1 to 3.9.1.	Agree
1.5	Effective Date of the Metrology Procedure: Part A The proposed effective date of the Metrology Procedure: Part A is 24 April 2015.	AGL agrees with the proposed changes as marked up in the procedures, the effective date for the Metrology Procedure will be 15 th May 2015 The proposed effective date in the response template appears to be incorrect and has been given as 24 th April 2014

B. Proposed Changes to Metrology Procedure: Part B

Item	Description	Comments
1	PROPOSED/ REQUESTED CHANGES	
1.1	Type 65 Substitution Table 1.8 Change “Type 65 EST” to “Type 65 SUB or EST”.	Agree
1.2	Type 65 Substitution Clause 4.2.7 The <i>Metering Data Provider</i> may use type 65 substitution or forward estimation type 65 only when the <i>metering data</i> from the same, or similar, <i>meter</i> reading period last year or the <i>metering data</i> from the previous <i>meter</i> reading period is not available (i.e. when type 61 and type 62 substitution or forward estimation methods cannot be used).	Agree
1.3	Type 65 Substitution 4.2.9(a) Substitutions may be type 61, 62, 63, 64, 65 , 66, 67 or 68.	Agree
1.4	Type 65 Substitution and replace “meter reading” with “energy consumption” 4.3.5 Type 65 – Forward Estimation by ADL Method The <i>Metering Data Provider</i> must provide a substitution or forward estimation of the meter reading energy consumption in accordance with the following formula: Meter Reading Energy Consumption = <i>Average Daily Load</i> * number of days required.	AGL agrees with the proposed change as marked up in the procedures. The change in the response template however appears to be incorrect, the wording should align with what was agreed in consultation with the MRG and captured in the response report and also what has been updated in the proposed marked up procedure. . The wording should read as; Type 65 – Forward Estimation by ADL Method

Item	Description	Comments
		<p>The <i>Metering Data Provider</i> must provide a <i>substitution or forward estimation</i> of the <i>meter reading by calculating the energy consumption</i> in accordance with the following formula:</p> <p>Meter-Reading Energy Consumption = Average Daily Load * number of days required.</p>
1.5	<p>Replace “meter reading” with “energy consumption” 4.3.1</p> <p>Type 61 - Previous Year Method (Average Daily Consumption method)</p> <p>The <i>Metering Data Provider</i> must provide a <i>substitution or forward estimation</i> of the <i>meter reading energy consumption</i> as per the following formula:</p> <p>Meter-Reading Energy Consumption = ADC_{LY} * number of days required</p> <p>where</p> <p>ADC_{LY} = average daily consumption from the same or similar <i>meter</i> reading period last year.</p>	<p>AGL agrees with the proposed changes as marked up in the procedures.</p> <p>The change in the response template however appears to be incorrect, the wording should align with what was agreed in consultation with the MRG and captured in the response report and also what has been updated in the proposed marked up procedure. .</p> <p>The wording should read as;</p> <p>Type 65 – Forward Estimation by ADL Method</p> <p>The <i>Metering Data Provider</i> must provide a <i>substitution or forward estimation</i> of the <i>meter reading by calculating the energy consumption</i> in accordance with the following formula:</p> <p>Meter-Reading Energy Consumption = Average Daily Load * number of days required.</p>
1.6	<p>Replace “meter reading” with “energy consumption” 4.3.2 Type 62 - Previous Meter Reading Method (Average Daily Consumption Method)</p> <p>The <i>Metering Data Provider</i> must provide a <i>substitution or forward estimation</i> of the <i>meter reading energy consumption</i> as per the following formula:</p>	<p>AGL agrees with the proposed changes as marked up in the procedures.</p> <p>The change in the response template however appears to be incorrect, the wording should align with what was agreed in consultation with the MRG and captured in the response report</p>

Item	Description	Comments
	<p style="text-align: center;">Meter Reading Energy Consumption = ADC_{PP} * number of days required.</p> <p style="text-align: center;">where</p> <p>ADC_{PP} = average daily consumption from the previous <i>meter</i> reading period.</p>	<p>and also what has been updated in the proposed marked up procedure. .</p> <p>The wording should read as;</p> <p>Type 65 – Forward Estimation by ADL Method</p> <p>The <i>Metering Data Provider</i> must provide a <i>substitution or forward estimation</i> of the <i>meter reading by calculating the energy consumption</i> in accordance with the following formula:</p> <p>Meter Reading Energy Consumption = Average Daily Load * number of days required.</p>
1.7	<p>Replace “meter reading” with “energy consumption” 4.3.3</p> <p style="text-align: center;">Type 63 Customer Class Method</p> <p>The <i>Metering Data Provider</i> must provide a <i>substitution or forward estimation</i> of the <i>meter reading</i> <i>energy consumption</i> as per the following formula:</p> <p style="text-align: center;">Meter Reading Energy Consumption = ADC_{CC} * number of days required</p> <p style="text-align: center;">where</p> <p>ADC_{CC} = average daily consumption for this customer class with the same type of usage.</p>	<p>AGL agrees with the proposed changes as marked up in the procedures.</p> <p>The change in the response template however appears to be incorrect, the wording should align with what was agreed in consultation with the MRG and captured in the response report and also what has been updated in the proposed marked up procedure. .</p> <p>The wording should read as;</p> <p>Type 65 – Forward Estimation by ADL Method</p> <p>The <i>Metering Data Provider</i> must provide a <i>substitution or forward estimation</i> of the <i>meter reading by calculating the energy consumption</i> in accordance with the following formula:</p> <p>Meter Reading Energy Consumption = Average Daily Load * number of days required.</p>

Item	Description	Comments
1.8	<p>Correction 14.3.3(a) (v) – change “shall” to “must” to be consistent with 14.4.3(a) (iii). If a device is shared with another <i>NMI</i>, the proportion of <i>load</i> that is agreed by affected <i>Registered Participants</i> to be attributable to that <i>NMI</i> (k). Each k factor will be less than 1. The sum of the k factors for a shared device across each respective <i>NMI</i> shall must be equal to 1,</p>	<p>Agree agrees with the proposed changes as marked up in the procedures.</p> <p>The change in the response template however appears to be missing the other Change included in the proposed marked up procedure and also included in the response report.</p> <p>AEMO, in consultation with the MRG, determined that a new sub-clause will be included under 14.3.3(a) and 14.4.3 (a) as follows: <i>viii. If a device is not shared with another NMI, the k factor must be equal to 1.</i></p>
1.9	<p>Correction 14.3.3(b) – clarify apportioning of shared devices. Each device in the <i>inventory table</i> is a unique combination of physical hardware, time control classification and shared portion, for example, if a device is shared with another <i>NMI</i>, the individual portion(s) of the device(s) must be included in the <i>inventory table</i> as a separate device type.</p>	<p>AGL agrees with the proposed changes as marked up in the procedures.</p> <p>The change in the response template appears to be missing the other Change included in the proposed marked up procedure and also included in the response report.</p> <p>14.3.3(b) – clarify apportioning of shared devices. Each device in the <i>inventory table</i> is a unique combination of physical hardware, time control classification and shared portion, for example, if a device is shared with another <i>NMI</i>, the individual portion(s) of the device(s) must be included in the <i>inventory table</i> as a separate device type on each NMI</p>

Item	Description	Comments
1.10	<p>Correction 14.3.5(b) – use <i>Rules</i> defined term <i>Eastern Standard Time</i>. The <i>responsible person</i> must ensure that the appropriate sunset times and sunrise times are obtained from the Australian Government Geoscience website (www.ga.gov.au/geodesy/astro/sunrise.jsp), based on the longitude and latitude of the relevant town as specified below, and Australian Eastern Time <i>Eastern Standard Time</i>:</p>	Agreed
1.11	<p>Correction 14.3.5(b) – change “SP AusNet” to “AusNet Services” in latitude/longitude table to reflect entity name change.</p>	Agreed
1.12	<p>Correction 14.3.4(b) – clarify apportioning of shared devices Each device in the <i>inventory table</i> is a unique combination of physical hardware, time control classification and shared portion, for example, if a device is shared with another <i>NMI</i>, the individual portion(s) of the device(s) must be included in the <i>inventory table</i> as a separate device type.</p>	<p>AGL agrees with the proposed changes as marked up in the procedures.</p> <p>The change in the response template however appears to be incorrect, the number in the response template should read as 14.4.3 (b) rather than 14.3.4 (b) to align with the marked up procedures.</p> <p>The change in the response template appears to be missing the other Change included in the proposed marked up procedure and also included in the response report.</p> <p>The template should read as; Each device in the <i>inventory table</i> is a unique combination of physical hardware, time control classification and shared portion, for example, if a device is shared with another <i>NMI</i>, the individual portion(s) of the device(s) must be included in the <i>inventory table</i> as a separate device type on each NMI</p>

Item	Description	Comments
		<p>In addition the change in the response template appears to be missing the other Change included in the proposed marked up procedure and also included in the response report.</p> <p>AEMO, in consultation with the MRG, determined that a new sub-clause will be included under 14.3.3(a) and 14.4.3</p> <p>(a) as follows:</p> <p>viii. If a device is not shared with another NMI, the k factor must be equal to 1.</p>
1.13	<p>Insert new section 14.6 – Traffic signal dimming New section 14.6 added to Metrology Procedure: Part B facilitate the calculation of metering data for traffic signals operating in dimmed mode – refer to change marked version of Metrology procedure: Part B included with consultation document package.</p>	<p>AGL agrees with the proposed changes as marked up in the procedures,</p> <p>The response pack template should show the words included in the new section as marked up in the procedures.</p> <p>14.6 Traffic signal dimming 14.6.1 Application of clause 14.6 (a) This clause 14.6 applies only to jurisdictions where traffic signals are classified as a market load. Traffic signals that are dimmed have characteristics of both “controlled unmetered loads” and “uncontrolled unmetered loads”. These traffic signals loads are similar to “controlled unmetered loads” as they have specifically defined periods that calculated metering data is based on full load values and dimmed load values. These loads are also similar to “uncontrolled unmetered loads” as they do not have a</p>

Item	Description	Comments
		<p>constant load and calculated metering data is based on an annual energy consumption for the load. Note:</p> <p>(b) The effective date of clause 14.6 is 1 July 2015.</p> <p>(c) The methodology for production of calculated metering data for dimmed traffic signals must be applied to periods from the clause 14.6 effective date stated in (b).</p> <p>(d) Revision of calculated metering data for periods before the clause 14.6 effective stated in (b) must be undertaken in accordance with the methodology detailed in clause 14.4.</p>
1.14	<p>Effective Date of the Metrology Procedure: Part B The proposed effective date of the Metrology Procedure: Part B is 24 April 2015.</p> <p>Effective Date for Clause 14.6: Proposed effective date for new clause 14.6 is 1 July 2015.</p>	<p>AGL agrees with the proposed changes as marked up in the procedures, the effective date for the Metrology Procedure will be 15th May 2015 and the 1st July 2015 for clause 14.6</p> <p>The proposed effective date in the response template appears to be incorrect and has been given as 24th April 2014 whereas the marked up procedure shows the effective date as 15th May 2015.</p>

2. Other Issues Related to Consultation Subject Matter

This section lists the changes proposed by respondents that are related to the subject matter of the consultation.

A. Other Consultation Related Issues – Metrology Procedure: Part A

Clause	Issue/Comment	Proposed Text	Rating (H/M/L)	AEMO Comments

B. Other Consultation Related Issues – Metrology Procedure: Part B

Clause	Issue/Comment	Proposed Text	Rating (H/M/L)	AEMO Comments